

DEC 13 2000

Via facsimile and Federal Express Mail

Gwen Zervas, Case Manager
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
401 East State Street
P. O. Box 028
Trenton, New Jersey 08625

Re: Forwarding of BTAG comments on the Work Plan for Delineating and Characterizing Elevated Lead Concentrations in Soil, for the L.E. Carpenter/Dayco Site, for BTAG Review and Comment.

Dear Ms. Zervas:

As you know from our telephone conversations as well as from my November 3, 2000 letter, addressed to your attention, the Work Plan for Delineating and Characterizing Elevated Lead Concentrations in Soil for the L.E. Carpenter/Dayco Site, Wharton, New Jersey, was forwarded to BTAG for review and comment. Please note that the BTAG has completed its review and their comments are as follows.

The April 1994 Record of Decision (ROD) specified excavation of soils which contain elevated levels of lead. However, during the excavations it was discovered that the extent of contamination was greater than anticipated. Therefore, a change in the remedial action may be proposed. Page 6 of the work plan notes that a human health risk assessment will be conducted to evaluate potential risks associated with direct contact and inhalation of lead. Please note that an ecological risk assessment should also be included. Based upon previous data, it appears that elevated lead concentrations have been detected in the drainage ditch adjacent to the site and the Rockaway River. Therefore, these areas should also be incorporated into the risk assessment. Additionally, a determination should be made if any of the adjacent wetlands have been impacted.

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In order to comply with federal wetlands ARARs, a wetlands assessment and restoration plan would be needed for any wetlands impacted or disturbed by contamination and/or remedial activities. Management practices (Federal Register Volume 51, No. 219, Part 330.6) should be implemented.

In conclusion, thank you, in advance, for the opportunity to review and comment on this document. If you have any questions, comments, or require further information, please contact me at (212) 637-4411.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

cc: Carole Petersen, Chief
Andy Crossland, PSB
Michael Sivak, PSB
Mindy Pensak, BTAG Coordinator

bcc: Stephen Cipot, SNJRS